

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

METROPOLITAN  
WOODWORKING, INC.  
METROPOLITAN  
ARCHITECTURAL WOODWORK,  
LLC., SPRINGFIELD OFFICE,  
CORP. SPRINGFIELD WOOD  
WORKSHIP, CORP.,  
CONSTRUCTION MACHINE  
DEVICES, LLC., AND DARREN  
COMMANDER,

Plaintiffs,

v.

SHAWN M. LATOURETTE IN HIS  
OFFICIAL CAPACITY AS  
COMMISSIONER OF THE NEW  
JERSEY DEPARTMENT OF  
ENVIRONMENTAL PROTECTION;  
AND MATTHEW PLATKIN IN HIS  
OFFICIAL CAPACITY AS  
ATTORNEY GENERAL OF THE  
STATE OF NEW JERSEY, PETER  
MADAN

Defendants.

CERTIFICATION OF DON HIRSCH  
BUREAU CHIEF NEW JERSEY DEPARTMENT OF ENVIRONMENTAL  
PROTECTION DIVISION OF WATER ENFORCEMENT

I, Don Hirsch, of full age, certify and say:

1. Based upon a review of Department records and knowledge of the underlying case, no one from the Department – Division of Water Enforcement visited the site in March 2024.
2. The Division of Water Enforcement did not request anyone else unaffiliated with the Department to visit the site in March 2024.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements by me are willfully false, I am subject to punishment.

By:   
Don Hirsch  
Bureau Chief  
Division of Water Enforcement

Dated: July 31, 2025